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AZ CORP COMMISSION DOCKET CONTROL

Attorneys for Western Resource Advocates

BEFORE THE ARIZONA CORPORATION COMMISSION

SUSAN BITTER SMITH, Chairman BOB STUMP BOB BURNS DOUG LITTLE TOM FORESE

ORIGINAL

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR APPROVAL OF NET METERING COST SHIFT SOLUTION.

Docket No. E-01345A-13-0248

INITIAL BRIEF OF WESTERN RESOURCE ADVOCATES

Pursuant to the Procedural Order issued on April 28, 2014 in this docket, Western Resource Advocates ("WRA") states that it takes no position on the issue of whether any portion of APS' April 2, 2015 filing must be considered in a rate case. However, for all of the reasons stated in WRA's Response filed on April 21, 2015, WRA continues to believe that the issues raised in APS' filing are best considered in a full rate case.

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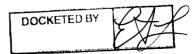
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Arizona Corporation Commission DOCKETED

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RESPECTFULLY SUBMITTED this 22nd day of May, 2015.

ARIZONA CENTER FOR LAW IN THE PUBLIC INTEREST

Timothy M. Hogan

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Phoenix, Arizona 85004

Attorneys for Western Resource Advocates

ORIGINAL and 13 COPIES of the foregoing filed this 22nd day of May, 2015, with:

Docketing Supervisor

Docket Control

Arizona Corporation Commission

1200 W. Washington

Phoenix, AZ 85007

COPIES of the foregoing electronically mailed this

22nd day of May, 2015, to:

All Parties of Record

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